



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,
vs.

CAROLYNNE R. PARKER
a/k/a CAROLYNNE R. NOFFSINGER,

Defendant.

4:23CR3082

INDICTMENT

18 U.S.C. § 666(a)(1)(A)

The Grand Jury charges that

COUNT I

On or about July 25, 2018 and continuing until on or about August 22, 2019, in the District of Nebraska, the defendant, CAROLYNNE R. PARKER a/k/a CAROLYNNE R. NOFFSINGER, being an agent of Fallbrook Family Health, said organization receiving more than \$10,000 in federal funding during calendar years 2018 and 2019, embezzled, stole, fraudulently obtained, and without authority knowingly converted at least \$5,000 in cash owned by and under the care, custody and control of Fallbrook Family Health.

In violation of 18 United States Code § 666(a)(1)(A).

FORFEITURE ALLEGATION

1. The allegations contained in Count I of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(7).
2. Upon conviction of the offense in violation of Title 18, United States Code, Section 666 set forth in Count I of this Indictment, the defendant, CAROLYNNE R. PARKER, a/k/a CAROLYNNE R. NOFFSINGER, shall forfeit to the United States of America, pursuant

to Title 18, United States Code, Section 982(a)(7), any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense.

3. If any of the property being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 982(a)(7) and 28 U.S.C. § 2461(c).

A TRUE BILL.

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FOREPERSON

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.

Danielle Fliam
Danielle Fliam
Assistant United States Attorney